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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 21-CR-00264
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	MARCH 8, 2022 TO APRIL 18, 2022 AND
v.)	PROPOSED ORDER
)	
BROGDAN VADUVA,)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Brogdan Vaduva, that time be excluded under the Speedy Trial Act from March 8, 2022 through April 18, 2022.

The government and counsel for the defendant agree that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced. The government has produced over 3,000 pages of discovery and the parties have been in plea negotiations. Further, the government intends to produce another large batch of discovery this week. For this reason, the parties stipulate and agree that excluding time until April 18, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from March 8, 2022 through

1 April 18, 2022, from computation under the Speedy Trial Act outweigh the best interests of the public
2 and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation and proposed order.

5
6 IT IS SO STIPULATED.

7 DATED: February 28, 2022

/s/

ALEXIS JAMES
Assistant United States Attorney

9 DATED: February 28, 2022

/s/

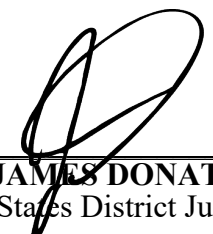
DAVID BEITCHMAN
Counsel for Defendant Brogdan Vaduva

11
12 **ORDER**

13 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
14 Court finds that failing to exclude the time from March 8, 2022 through April 18, 2022 would
15 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective
16 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The
17 Court further finds that the ends of justice served by excluding the time from March 8, 2022 to April 18,
18 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the
19 defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED
20 that the time from March 8, 2022 through April 18, 2022 shall be excluded from computation under the
21 Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

22 IT IS SO ORDERED.

23
24 DATED: 3/3/2022



HON. JAMES DONATO
United States District Judge